

# EXHIBIT E



Amy Dashiell  
Direct Dial: 512.495.6340  
adashiell@scottdoug.com

May 14, 2024

**SENT VIA E-MAIL**

Max Schreiber  
Alexander Liebmann  
LIEBMANN & LIEBMANN, P.A.  
714 N. Spring St.  
Pensacola, FL 32501  
[maxschreiber145@gmail.com](mailto:maxschreiber145@gmail.com)  
[alex@liebmannlaw.net](mailto:alex@liebmannlaw.net)

In Re: Case No. 1:23-v-1373DII; *Michael Kacsak v. Expedia, Inc.*

Dear Max and Alex:

This letter responds to your communications regarding Expedia's discovery responses and document production.

As referenced on our call, we produced to you our first set of document production on May 2, consisting of ~ 1,700 documents consisting of about 11,000 pages of documents.

With regard to the issues raised on Plaintiff's "Replies" to our discovery responses, please see below. We look forward to continuing to discuss and hopefully reach a resolution on these issues.

**Requests for Production**

RFP Nos. 1, 18, 23, 30: In light of Plaintiff's proposed interpretation/clarification of those requests, Expedia has conducted a reasonable search for responsive documents and produced documents responsive to the requests, and is not withholding any documents on the basis of its objections.

RFP No. 4: Expedia has already responded to Interrogatory No. 21, stating that the racial or gender makeup of the Company's hiring or workforce does not factor into the compensation of the individuals involved in the decision not to hire Kacsak. Their employment contracts are not relevant.

RFP No. 5 and 15: We are reviewing these revised requests and will get back with you.

Max Schreiber  
Alexander Liebmann  
May 14, 2024  
Page 2

RFP No. 9: Expedia has not released a 2023 Inclusion and Diversity Report or similar report. If Expedia publishes any report or similar report in the future, Expedia will produce it.

RFP No. 10, 21: Expedia has a database and dashboard that contains various employee statistics, including information on employee gender and race. We are in the process of better understanding that database and will get back to you on these revised requests. We are also producing Expedia's 2022 EEO-1 Report which contains workplace demographic data.

RFP No. 12, 14, 24, 27: The Global Sourcing position was to be a new role at Expedia. It has not been filled. Expedia does not believe that the requested documents related to "any person who fulfilled a responsibility of the role" is relevant and stands on its objections. If the position is filled during the course of the litigation, Expedia will revisit its objections.

RFP No. 17: The terms of Ms. Allen's severance agreement are not relevant, but Expedia will supplement its response to Interrogatory No. 2.

RFP No. 20, 21: Expedia's plans for how to achieve its hiring targets are set forth in the Inclusion and Diversity Reports, License to Hire materials, and other documents that were produced.

### Interrogatories

With regard to the Interrogatories, Expedia objects to Plaintiffs' attempt to completely rewrite its interrogatories as set forth in its "Reply" to Interrogatory No. 1, 3, 5, and 19. If Plaintiff wants to send these as additional Interrogatories, please do so.

Expedia is in the process of supplementing several of its responses and will get supplemental responses to you shortly.

Sincerely,

*/s/ Amy Dashiell*  
Amy Dashiell

AD